

ORIGINAL  
RECEIVED

JAN 10 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20054

In the matter of )

Federal-State Joint Board on )  
Universal Service )

CC Docket No. 96-45

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF ITCs IN RESONSE TO THE COMMISSIONS'  
REQUEST FOR COMMENT ON THE FEDERAL-STATE JOINT BOARD  
RECOMMENDED DECISION ON UNIVERSAL SERVICE

January 10, 1997

David A. Irwin  
Irwin, Campbell & Tannenwald, P.C.  
1730 Rhode Island Ave, NW, Ste. 200  
Washington, D.C. 20036-3101  
(202) 728-0400

## **SUMMARY**

ITCs submits these Reply Comments on behalf of the rural telecommunications providers it serves. This proceeding and its results are utmost critically important to the rural Local Exchange Carriers serving sparsely populated and harsh geography of the Mid-west and Rocky Mountain regions of the United States. These companies would not exist nor would their customers be served were it not for the support process that has been inherent in the provision of telecommunications services for over a century.

The Federal-State Joint Board Recommended Decision is a well intentioned product that clearly reflects enormous effort by the Joint Board members and staff representatives. However, the FCC must recognize that if implemented the Recommended Decision will become a major contributor to the degradation of rural service unless it is modified by the FCC's report, order and rules.

The principle of competitive neutrality is a critical and positive element in the Recommendation; however, certain steps employed to ensure neutrality will not contribute to the success of the process. The imposition of a freeze using retroactive data leaves the rural telephone service provider without a means of recovering costs incurred during the interim and therefor, violates the "specific, predictable and sufficient" requirements of the 1996 Act. Further, the absence of a reasonable means of recovery also brings into question the "takings" prohibition contained in the Fifth Amendment of the United States Constitution.

The same can be said for the use of forward looking costs and the use of proxy models when they produce hypothetical costs that do not reflect past, present or future reality.

In terms of supported services, the lack of support for second lines and, eventually, business services prejudices the rural consumer in that the cost of these services will no longer be conducive to their use. This severely limits access to needed resources and the long term viability of the rural business community. It likewise, violates the Act's principle of comparable services and rates between rural and urban areas.

As indicated above, ITCs is concerned about the potential abandonment of plant and in consequence thereof offers a means of recovery. In addition, there remain concerns over the potential differences in composition between large and small company USF service areas and the potential inequities that may result.

Finally, ITCs has recommended a universal service cost and distribution system that is usage sensitive and, therefore lowers the USF requirement as usage (and revenues) increase.

In conclusion, ITCs remains concerned about the direction the Recommendations are taking the USF. But, nevertheless, ITCs believes that , with modifications, the ultimate USF program will meet the intended goals and objectives of universal service public policy.

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20054**

In the matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	

**REPLY COMMENTS OF ITCs IN RESPONSE TO THE COMMISSIONS'  
REQUEST FOR COMMENT ON THE FEDERAL-STATE JOINT BOARD  
RECOMMENDED DECISION ON UNIVERSAL SERVICE**

ITCs, Inc., an economic cost consultant to independent telephone companies serving America's rural areas, including Chariton Valley Telephone Company, Columbine Telephone Company, Cunningham Telephone Company, DeKalb Telephone Cooperative, Inc., ETEX Telephone Cooperative, Mogan Dial, Inc.- Kansas, Mogan Dial, Inc.-Missouri, Moultrie Independent Telephone Co., Inc., South Central Telecommunications of Kiowa, South Central Telephone Association - Kansas, South Central Telephone Association - Oklahoma, Steelville Telephone Exchange, Inc., Tri-County Telephone Association, Inc., TCT West, Inc., and Wiggins Telephone Association, by counsel, respectfully submit reply comments on the Recommended Decision of the Federal-State Joint Board on Universal Service to the Commission adopted November 7, 1996 and solicited by Public Notice DA 96 1891 released November 18,1996 as follows:

## **Background**

1. As indicated in ITCs comments in this matter, the importance of high quality telecommunications services to the rural Mid-west and Rocky Mountain region can not be understated. Quality and affordable service is there today because of universal service policies adopted by the industry, pursued as public policy and now codified by the Telecommunications Act of 1996. Absent this approach, and the support it provided, this Nations' role as the economic leader of the world would never have been achieved nor would the rural American way of life or standard of living ever have been attained.

2. Yet, now, well intentioned recommendations of the Joint Board threaten the very cornerstone of this element of our society in a manner that could cause significant deterioration in the quality of service and the lives of rural Americans. One need only examine the deregulatory efforts in modern history to see that the end result in rural America has had just the affect that is feared the most by ITCs and others in this proceeding. Indeed as pointed out in ITCs' comments, many rural providers have dramatically reduced construction programs as a result of the doubts cast by the Joint-Board recommendation.

3. This was not the intent of Congress nor is it the will of the American people. Our citizens demand, and are entitled to, an orderly well thought out process of implementation that recognizes the importance of telecommunications, the impact on all Americans and the failures of past deregulatory programs.

4. It is to that end that the following comments are offered.

### **Competitive Neutrality**

5. ITCs totally supports the concept of competitive neutrality as a fundamental underlying principle in the administration of universal service public policy and in the design and implementation of rules that will bring that policy to reality. However, in support of Ameritech's comments (at page 11.), the Recommendations fail to recognize the role of the carrier of last resort, past, present and future, and to equalize the burdens between them and prospective new entrants. It is not that incumbents should be favored or given a special place in telecommunications history; but only that the very policy of competitive neutrality apply equally to them. The obvious bias against incumbents is not appropriate, legal, or befitting of the regulatory process.

6. Accordingly, the Commission should take steps to recognize the obligations of COLRs, the risks that they undertake and the costs incurred in fulfilling that vital role. Until this takes place, the principle of competitive neutrality will not rise to the intended level of importance, meaning or reality envisioned by the Joint Board.

### **The USF Support Freeze**

7. As indicated by USTA (at page 29), the imposition of the freeze falls far short of the requirements of "specific, predictable and sufficient" support requirements of Section 254 (b)(5). Those ILECs involved in new construction and upgrades will not receive sufficient support for the efforts they have undertaken in 1996 or had planned to take in 1997. This retroactive approach is clearly a violation of past practice and precedent ("Hope" and "Dusquesne") and the 1996 Act.

8. These elements of the Recommendation have already had a negative impact. Mogan Dial Inc., for example, is re-examining the provision of services to a new subdivision and its ability to accommodate an area code change. Tri-County Telephone Association and TCT West are completing efforts in progress but will not proceed further. Steelville Telephone Exchange has dropped all further network development. In all cases these actions are being taken because of the uncertainty result directly from the Recommendation. This is not in the best interest of the industry or the consumer; yet, there is no other responsible choice. One must ask if this is really the outcome expected by consumers, Congress, the industry or the regulators.

8. While ITCs strongly advocates a continuation of the present process until such time as a proven alternative can be developed, the USTA approach, detailed in their comments (at pages 27-28), copy attached herein, could well serve as an interim alternative. It provides for a base period more current than the proposed recommendation, it allows for consideration of upgrades and new construction and it accommodates sales, mergers and acquisitions. Adoption of such an approach will bring rules resulting from the Recommendation into compliance with the plain language of the 1996 Act.

#### Forward Looking Costs

9. Also in the name of competitive neutrality is the proposed use of forward looking costs. Since when does Wall Street provide capital, since when do consumers buy, since when do suppliers provide materials and labor based on hypothetical costs? Suggesting such to the salesperson at Sears the next time one purchases a Kenmore washer might elicit an interesting response. Practically speaking, the use of hypothetical costs usually results in a “fine,

imprisonment or both” (with all due respect to the Department of Justice economists). Finally, hypothetical costs are arbitrary and as such are governed by the entity that does the arbitration.

10. ITCs supports the views offered by SBC (at pages ii and iii), USTA (at page 12), Ameritech (at page 12) and others, that use of forward looking costs is not suitable for determination of supported cost levels. The determination should be based on the actual costs of providing for universal service; in other words, factual information. It is the best means of insuring that funds were used as intended, that funds are not provided when no longer necessary, that carriers not are deprived of the recovery of their costs, that false signals are not sent to new entrants and, most importantly, that the consumer is receiving comparable service at comparable rates. Use of actual costs will also best meet the requirements of “specific, predictable and sufficient” support. We urge the commission to reconsider this position.

#### Proxy Models

11. The use of a Proxy model is also intended to ensure competitive neutrality; yet, as SBC so effectively demonstrates (at pages 26-30), the disparity between the two proposed models, and between the models and actual costs clearly reflect the current “state of the art”. Therefor, to advocate this approach at this time violates the “predictable” requirement of the Act, reflects a lack of concern for rural consumers who must wait until their provider can prudently resume upgrades and provide new systems, and opens the doors of litigation as companies defend their property under the “takings” provisions of the Constitution.



## **Supported Services**

### **Residence Service**

12. ITCs agrees with those who question the wisdom of limiting support to a single line. First, the Act makes specific reference to the principle of providing comparable services at comparable rates in referencing high cost rural subscribers' services compared to urban services. Limiting supported services to a single line forces a rate for a second line to a level that is clearly not comparable to second lines in an urban areas. This prejudice against the rural subscriber goes far beyond the intent of Congress and actually results in a withdrawal of an existing supported service. Further, second lines are often used to extend the research capability of the rural student to a level comparable to that of urban students. Due to distances and transportation requirements, the rural student can not simply stay after school or drop in to the local library on the way home. Thus a second line is often the only means of access to library material, the vast resources of the Internet and the analysis of current events that are readily available to the urban population. Simply stated, the need for a second line is often greater in rural areas; yet under the Recommendation's approach it could well become unaffordable.

### **Business Services**

13. A similar bias against the business consumer is also reflected in the recommendation. Here again, communications services are the cornerstone of economic success which, in turn, are vital element in the rural standard of living. To not support these services in high cost areas clearly limits not only business development but the economic viability of existing commercial

enterprises as well. Nowhere in the Act, the underlying Conference Report or in any public policy related to small businesses is this the intended result.

14. Limiting the lines eligible for support in high cost areas will leave the cost of supplemental lines unaffordable and will discourage usage which, in turn, will limit the decline in the cost per unit of traffic. Further, the end result will complicate the intra-state pricing and tariff development process beyond recognition. Finally, as mentioned above, all past deregulation programs resulted in a degradation of services in rural America. These approaches by the Joint Board will certainly doom the quality of rural telecommunications service to the same fate if corrective action is not taken in the development of rules.

#### Advanced Services

15. The Joint Board found that the educational, library and health care elements of society warrant support for advanced services while also finding that the family home and the economic facets of society should be denied support for these same services. Not only does this violate the comparable service at comparable cost principle, it denies rural populations access to information and services that are only “down the block” or “across the street” in the urban world. If indeed, the Act, the Recommendations and the rules are intended to compensate for the barriers of distance and density faced by rural Americans; if indeed, the intent is to not separate the population in to “haves and have nots” then this aspect of the Recommendation must be reconsidered and changed.

### Administrative Burdens

16. In the attempt to “fine tune” business and residence line support eligibility, the issue of administrative burden must also be taken into consideration. The monitoring of lines into a residence to determine if it is a second line or a primary line for a second resident, the determination of “second” homes and the isolation of single lines terminating in multiple answering arrangements are all examples of the administrative nightmare that may lie ahead. Surely this was not the intent behind the Act and the Joint Board effort.

### Cost Recovery

17. Of great concern to those who may become subject to use of forward looking costs, the freeze and the use of proxy models, is the recovery of costs previously incurred but not yet recovered. The “takings” clause of the Fifth Amendment, as well as the results of the Hope and Dusquesne cases clearly lay the foundation for the obligations of parties involved in the provision of services under regulation. At some point, the Commission must address the fulfillment of these obligation; yet time is running out.

18. If the past is any indication of the present situation, the difference between the level of costs incurred in a regulated environment and those involved in providing competitive services is such that, on balance, there may well be a requirement to clear certain assets from the accounts in order to operate competitively. The present direction of the Commission suggests this is the difference between embedded costs and the results of TELRIC studies or the proxy models derived therefrom.

19. Should this be the case, the Commission might consider a process whereby each Incumbent Local Exchange Carrier presents the difference between their audited financial statements related to their investment accounts and either a TELRIC study or a proxy reflecting these same accounts. The difference would then be subject to recovery through Universal Service Fund support over a three year period. From that point forward, TELRIC investment costs (individual exchange carrier or proxy) would be used for USF purposes. During the interim, the basis of USF support would also be based on forward looking costs in order to not duplicate recovery of embedded costs. For example, if existing plant is 50% depreciated (on an economic basis) then the net book value of such plant would be compared to like TELRIC plant similarly depreciated and the difference subjected to the treatment outlined above. Similarly, if the remaining life of certain plant items is half of the original life but only 35% of the investment has been recovered, the 15% under depreciated amount should be added to the comparable difference outlined above in order to create the competitive neutrality that the principle demands.

20. An approach such as this might well solve the immediate problem, provide for specific, predictable and sufficient support and provide for the needs of rural America.

#### **Study Area Size**

21. The recommendation indicates that, for rural providers, the size of the geographical area applicable for USF purposes should be the present day Study Area but leaves variable the size of the applicable area for large companies. This may well result in an inequity in that present day Study Areas often incorporate a small urban area which, through averaging, lowers the cost per loop. If adjacent large company areas are not similarly constructed the end result

will be a disparity in support between the two areas. This is not equitable or consistent and requires modification.

### **Universal Service Support Mechanism**

22. Attached to prior submissions in this and the precedent proceeding, ITCs submitted a proposal outlining a simplified mechanism for the determination and distribution of support funding. That proposal, modified to incorporate the Recommendations, could easily be used as the vehicle for support. Of importance is the fact that the proposal was usage sensitive in that, as usage increased the support requirement decreased. This provides incentives to increase interexchange usage and relieves fund pressure as ILEC-specific subscriber-generated revenues offset high cost burdens.

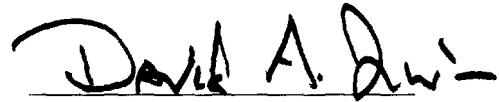
23. ITCs recommends the staff review the proposal for application in the present proceeding.

### **Conclusion**

24. ITCs and its rural telephone company constituents remain extremely concerned about the direction the Joint Board Recommendation is leading the industry. The legal considerations, adherence to the intent of the 1996 Act and practical considerations dictate reconsideration and modification of several underlying cornerstones of the proposal. With these modifications, the process will certainly maintain and enhance the quality of telecommunications service, and

thereby the economic leadership of the United States, and accordingly, the well being of its people.

Respectfully submitted,

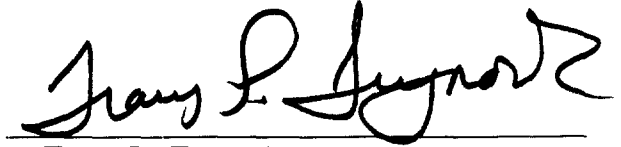
A handwritten signature in black ink, reading "David A. Irwin". The signature is written in a cursive style with a horizontal line underneath the name.

David A. Irwin  
Irwin, Campbell & Tannenwald, P.C.  
1730 Rhode Island Ave., NW, Ste 200  
Washington, D.C. 20036-3101  
(202)728-0400

January 10, 1997

# CERTIFICATE OF SERVICE

I, Tracy L. Trynock, hereby certify that on this 10th day of January, 1997, copies of the foregoing "Reply Comments of ITCs in Response to the Commissions' Request for Comment on the Federal-State Joint Board Recommended Decision on Universal Service" have been served by first-class United States mail, postage pre-paid, upon the following:

A handwritten signature in black ink, appearing to read "Tracy L. Trynock", written over a horizontal line.

Tracy L. Trynock

Amy Dougherty, Attorney  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

Don Gilbert  
Cathy Hotka  
National Retail Federation  
325 7th Street, N.W., Suite 1000  
Washington, D.C. 20004

David Becket, Esq.  
Assistant Attorney General  
Colorado PUC  
1580 Logan Street  
Office Level 2  
Denver, CO 80203

Kofi Asiedu Ofori, Counsel  
Office of Comm. Of the United Church of Christ  
2000 M Street, N.W.  
Suite 400  
Washington, D.C. 20036

Richard J. Johnson  
Brian T. Grogan  
Moss & Barnett  
Attorneys for The Minnesota Indep. Coalition  
4800 Northwest Center, 90 South 7th Street  
Minneapolis, MN 55402-4129

Angela J. Campbell  
Ilene R. Penn  
John Podesta  
Institute for Public Representation  
600 New Jersey Ave., N.W.  
Washington, D.C. 20001

Katherine Grincewich  
Office of the General Counsel  
United States Catholic Conference  
3211 4th Street, NE  
Washington, D.C. 20017-1194

Andrea Kelsey  
David Bergmann  
Richard Pace  
Assistant Consumers' Counsel  
77 South High Street, 15th Floor  
Columbus, OH 43266-0550

Judith St. Ledger-Roty  
Stefan M. Lopatkiewicz  
Reed Smith Shaw & McClay  
1301 K Street, N.W., East Tower  
Washington, D.C. 20005

Kenneth Lein, Manager  
Winnebago Cooperative Telephone Assoc.  
704 East Main  
Lake Mills, IA 50450

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554

The Honorable Rachelle B. Chong, Commissioner  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

The Honorable Susan Ness, Commissioner  
Federal Communications Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554

The Honorable Julia Johnson, Commissioner  
Federal Communications Commission  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850



The Honorable Kenneth McClure  
Vice Chairman  
Missouri Public Service Commission  
301 West High St., Suite 530  
Jefferson City, MO 65102

The Honorable Sharon L. Nelson  
Chairman  
Washington Utilities and Transportation  
Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder  
Commissioner  
South Dakota Public Utilities Commission  
500 E Capital Avenue  
Pierre, SD 57501

Martha S. Hogerty  
Public Counsel for the State of Missouri  
P.O. Box 7800  
Harry S. Truman Building, Room 250  
Jefferson City, MO 65102

Paul E. Pederson  
State Staff Chair  
Missouri Public Service Commission  
P.O. Box 360  
Truman State Office Building  
Jefferson City, MO 65102

Kisa Boehley  
Federal Communications Commission  
2100 M Street, N.W., Room 8605  
Washington, D.C. 20554

Charles Bolle  
South Dakota, PUC  
State Capitol, 500 E. Capitol Street  
Pierre, SD 57501-5070

Deonne Bruning  
Nebraska PSC  
300 The Atrium  
1200 N. Street, P.O. Box 94927  
Lincoln, NE 68509-4927

James Casserly  
Federal Communications Commission  
Office of Commissioner Ness  
1919 M Street, Room 832  
Washington, D.C. 20554

John Clark  
Federal Communications Commission  
2100 M Street, room 8619  
Washington, D.C. 20554

Bryan Clopton  
Federal Communications Commission  
2100 M Street, N.W., Room 8615  
Washington, D.C. 20554

Irene Flannery  
Federal Communications Commission  
2100 M Street, Room 8922  
Washington, D.C. 20554

Daniel Gonzalez  
Federal Communications Commission  
Office of Commissioner Chong  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

Emily Hoffnar  
Federal Communications Commission  
2100 M Street, N.W., Room 8623  
Washington, D.C. 20554

L. Charles Keller  
Federal Communications Commission  
2100 M Street, N.W., Room 8918  
Washington, D.C. 20554

Lori Kenyon  
Alaska PUC  
1016 West Sixth Avenue, Suite 400  
Anchorage, AK 99501

David Krech  
Federal Communications Commission  
2025 M Street, N.W., Room 7130  
Washington, D.C. 20554

Debra M. Kriete  
Pennsylvania Public Utilities Comm.  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Diane Law  
Federal Communications Commission  
2100 M Street, N.W., Room 8920  
Washington, D.C. 20554

Mark Long  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Gerald Gunter Building  
Tallahassee, FL 32399-0850

Robert Loube  
Federal Communications Commission  
2100 M Street, N.W., Room 8914

Samuel Loudenslager  
Arkansas Public Service Commission  
P.O. Box 400  
Little Rock, AR 72203-0400

Sandra Makeeff  
Iowa Utilities Board  
Lucas State Office Building  
Des Moines, IA 50319

Philip F. McClelland  
Pennsylvania Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Michael A. McRae  
D.C. Office of the People's Counsel  
1133 15th Street, N.W., Suite 500  
Washington, D.C. 20005

Tejal Mehta  
Federal Communications Commission  
2100 M Street, N.W., Room 8625  
Washington, D.C. 20554

Terry Monroe  
New York Public Service Commission  
Three Empire Plaza  
Albany, NY 12223

John Morabito  
Deputy Division Chief, Accounting & Audits  
Federal Communications Commission  
2000 L Street, N.W., Suite 812  
Washington, D.C. 20554

Mark Nadel  
Federal Communications Commission  
1919 M Street, N.W., Room 542  
Washington, D.C., 20554

John Nakahata  
Federal Communications Commission  
Office of the Chairman  
1919 M Street, N.W., Room 814  
Washington, D.C., 20554

Lee Palagyi  
Washington Utilities & Transportation Comm.  
1300 South Evergreen Park Drive, S.W.  
Olympia, WA 98504

Kimberly Parker  
Federal Communications Commission  
2100 M Street, N.W., Room 8609  
Washington, D.C. 20554

Barry Payne  
Indiana Office of the Consumer Counsel  
100 North Senate Ave., Room N501  
Indianapolis, IN 46204-2208

Jeanine Poltronieri  
Federal Communications Commission  
2100 M Street, N.W., room 8924  
Washington, D.C. 20554

Gary Seigel  
Federal Communications Commission  
2000 L Street, N.W., Suite 812  
Washington, D.C. 20554

Richard Smith  
Federal Communications Commission  
2100 M Street, N.W., Room 8605  
Washington, D.C. 20554

Pamela Szymczak  
Federal Communications Commission  
2000 L Street, N.W., Suite 257  
Washington, D.C. 20036

Lori Wright  
Federal Communications Commission  
2100 M Street, N.W., Room 8603  
Washington, D.C., 20554

Eileen Benner  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074

Charles Bolle  
South Dakota Public Utilities Commission  
State Capital, 500 E. Capital Ave.  
Pierre, SD 57501-5070

Lorraine Kenyon  
Alaska Public Utilities Commission  
1016 West Sixth Ave., Suite 400  
Anchorage, AK 99501

Clara Kuehn  
Federal Communications Commission  
2000 L Street, N.W., Suite 257  
Washington, D.C. 20036

Rafi Mohammed  
Federal Communications Commission  
2000 L Street, N.W., Suite 812  
Washington, D.C. 20036

Andrew Mulitz  
Federal Communications Commission  
2000 L Street, N.W., Suite 257  
Washington, D.C. 20036

Gary Oddi  
Federal Communications Commission  
2000 L Street, N.W., Suite 257  
Washington, D.C. 20036

Lee Palagyi  
Washington Utilities & Transportation Comm.  
P.O. Box 47250  
Olympia, WA 98504-7250

Jeanine Poltronieri  
Federal Communications Commission  
2000 L Street, N.W., Suite 257  
Washington, D.C. 20036

James Bradford Ramsay  
Natl. Assoc. Of Regulatory Utility Comm.  
1201 Constitution Ave., N.W.  
Washington, D.C. 20423

Jonathan Reel  
Federal Communication Commission  
2000 L Street, N.W., Suite 257  
Washington, D.C. 20036

Brian Roberts  
California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102-3298

Whiting Thayer  
Federal Telecommunications Commission  
2000 L Street, N.W., Suite 812  
Washington, D.C. 20036

Alex Belinfante  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Larry Povich  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

International Transcription Service  
1990 M Street, N.W., Room 640  
Washington, D.C. 20036

The Interactive Services Association  
Edwin N. Lavergne  
J. Thomas Nolan  
Ginsburg Feldman & Bress, Chartered  
1250 Connecticut Ave., N.W.  
Washington, D.C. 20036

Ellis Jacobs  
Council for the Edgemont Neighborhood  
Coalition  
Legal Aid Society of Dayton  
333 West First Street, Suite 500  
Dayton, OH 45402

Public Utility Commission of Texas  
Vicki Oswalt  
Director, Office of Policy Development  
7800 Shoal Creek Blvd.  
Austin, TX 78757-1098

Brite Voice Systems, Inc.  
David F. Hemmings  
Executive Vice President  
7309 East 21st Street, North  
Wichita, KS 67206

Ronald A. Gagnon  
Executive Director  
Noble  
26 Cherry Hill Drive  
Danvers, MA 01923

Carolyn Purcell  
Executive Director  
Department of Information Resources  
P.O. Box 13564  
Austin, TX 78711-3564

Adam Turner  
Consultant to the Resident Representative  
2121 R Street, N.W.  
Washington, D.C. 20006

Mitchell Sprague  
Mendocino Unified School District  
P.O. Box 1154  
Mendocino, CA 95460

Allied Associated Partners, LP  
Geld Information Systems  
Curtis T. White, Managing Partner  
4201 Connecticut Ave., N.W., Suite 402  
Washington, D.C. 20008-1158

Ronald K. Greenhalgh  
Chief Engineer  
Natl. Rural Electric Cooperative Assoc.  
4301 Wilson Blvd.  
Arlington, VA 22203-1860

State of South Carolina  
Public Service Commission  
R. Glenn Rhyne, Manager  
Research Department, PO Drawer 11649  
Columbus, SC 29211

Jeanne Hurley Simon  
U.S. Natl. Commission on Libraries & Inf. Sci.  
1110 Vermont Ave., N.W., Suite 820  
Washington, D.C. 20005-3522

Lucella Harrison, President  
Oakland Unified School District  
1025 Second Ave.  
Oakland, CA 94606

Judith A. Billings  
Superintendent of Public Instruction  
Old Capital Building  
P.O. Box 47200  
Olympia, WA 98504-7200

Dr. William J. Tobin  
Executive Director  
Early Childhood Dev. Center Leg. Coalition  
3612 Bent Branch Court  
Falls Church, VA 22041

Kevin Starr  
State Librarian of California  
California State Library  
Library Court Building  
P.O. Box 942837  
Sacramento, CA 94237-0001

Wayne A. Leighton, PHD  
James L. Gattuso  
Citizens for a Sound Economy  
1250 H Street, N.W., Suite 700  
Washington, D.C. 20005

Dr. Stanley Gardner  
Missouri State Library  
P.O. Box 387  
Jefferson City, MO 64102

Mark Savage  
1535 Mission Street  
San Francisco, CA 94103

Eric B. Witte  
Assistant General Counsel  
Attorney for the Missouri PSC  
P.O. Box 360  
Jefferson City, MO 65102

Thomas E. Taylor  
Jack B. Harrison  
Frost & Jacobs  
Attorneys for Cincinnati Bell Telco  
2500 PNC Center, 201 E. Fifth Street  
Cincinnati, OH 45202

Kevin J. Connellan  
Acting Director, Legislation & Policy  
AARP  
601 E Street, N.W.  
Washington, D.C. 20049

Bradley C. Stillman, Esq.  
Director, Telecommunications Policy  
Dr. Mark N. Cooper, Director, Research  
Consumer Federation of America  
1424 16th St., N.W., Suite 604  
Washington, D.C. 20036

Richard A. Skoff  
Attorney for Natl. Exchange Carrier  
Association, Inc.  
100 South Jefferson Road  
Whippany, NJ 07981

Andrew D. Lipman  
Mark Sievers  
Swidler & Berlin, Chartered  
Attorneys for MFS Comm. Co. Inc.  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007

The Nynex Telephone Companies  
Joseph Dibella  
1300 I Street, N.W., Suite 400 West  
Washington, D.C. 20005

Kenneth T. Burchett  
V.P. GVNW Inc./Management  
P.O. Box 230339  
Portland, OR 97281-0399

The Southern New England Telco  
Anne U. MacClintock  
V.P., Regulatory Affairs & Public Policy  
227 Church St.  
New Haven, CT 06510

Daniel L. Brenner  
Neal M. Goldberg  
David L. Nicoll  
Counsel for the Natl. Cable T.V. Assoc., Inc.  
1724 Massachusetts Ave., N.W.  
Washington, D.C. 20036

National Association of Regulatory Utility  
Commissioners  
Paul Rodgers  
Charles D. Gray  
P.O. Box 684, 1201 Constitution Ave., Suite 1102  
Washington, D.C. 20044

Bellsouth Corporation  
M. Robert Sutherland  
Richard M. Sbaratta  
Rebecca M. Lough  
1155 Peachtree St., N.E., Suite 1700  
Atlanta, GA 30309-3610

Michael J. Karson  
Attorney for Ameritech  
2000 West Ameritech Center Dr.  
Room 4H88  
Hoffman Estates, IL 60916-1025

Vanguard Cellular Systems, Inc.  
Raymond G. Bender, Jr.  
J. G. Harrington  
ITS Attorneys  
1200 New Hampshire Ave., N.W., Suite 800  
Washington, D.C. 20037

U.S. West, Inc.  
Kathryn Marie Krause  
1020 19th Street, N.W., Suite 700  
Washington, D.C. 20036

MCI Telecommunications Corporation  
Chris Frentrup  
Senior Regulatory Analyst  
1801 Pennsylvania Ave., N.W.  
Washington, D.C. 20036

Telecommunications Resellers Association  
Charles C. Hunter  
Hunter & Mow, P.C.  
1620 I Street, N.W., Suite 701  
Washington, D.C. 20006

United States Telephone Association  
Mary McDermott  
Linda Kent  
Charles D. Cosson  
1401 H Street, N.W., Suite 600  
Washington, D.C. 20005

The Personal Communications Industry  
Association  
Mark J. Golden  
Robert R. Cohen  
500 Montgomery St., Suite 700  
Alexandria, VA 22314-1561

Roberta Katz  
Peter Harter  
Netscape Communications Corp.  
487 East Middlefield Road  
Mountain View, CA 94043

Jeffrey Blumenfeld  
Glenn Manishin  
Christy Kunin  
Christine Mailloux  
1615 M Street, N.W., Suite 700  
Washington, D.C. 20036

NRTA  
Margot Smiley Humphrey Koteen & Naftalin, LLC  
1150 Connecticut Ave., N.W., Suite 1000  
Washington, D.C. 20036

NTCA  
David Cooson  
L. Marie Guillory  
Steve Watkins  
2626 Pennsylvania Ave., N.W.  
Washington, D.C. 20037

OPASTCO  
Lisa M. Zaina  
Ken Johnson  
21 Dupont Circle, N.W.  
Suite 700  
Washington, D.C. 20036

David R. Poe  
Yvonne M. Coviello  
Attorneys for Time Warner Comm.  
Leboeuf Lamb Green & Macrae LLP  
1875 Connecticut Ave., N.W., Suite 1200  
Washington, D.C. 20009

Paul B. Jones  
Janis A. Stahlhut  
Donald Shephard  
Time Warner Comm. Holdings, Inc.  
300 First Stamford Place  
Stamford, CT 06902-6732

AT&T Corporation  
Mark C. Rosenblum  
Peter H. Jacoby  
Judy Sello  
295 North Maple Ave., Room 3244J1  
Basking Ridge, NJ 07920

State of New Jersey  
Board of Public Utilities  
Dr. Edward H. Salmon, Commissioner  
CN-350  
Trenton, NJ 08625-0350

Richard McKenna, HQE03J36  
Attorney for GTE Service Corporation  
P.O. Box 152092  
Irving, TX 75015-2092

Gail L. Polivy  
Attorney for GTE Service Corporation  
1850 M Street, N.W., Suite 1200  
Washington, D.C. 20036

Nynex Government Affairs  
Susan Guyer  
1300 I Street, N.W., Suite 400 West  
Washington, D.C. 20005

Kathleen F. O'reilly  
Attorney for the Michigan Consumer Federation  
414 A Street, Southeast  
Washington, D.C. 20003

State of Washington  
Washington State Library  
Attention: Nancy Zussy  
P.O. Box 42460  
Olympia, WA 98504-2460

Kathleen Q. Abernathy  
David A. Gross  
Attorneys for Airtouch Communications, Inc.  
1818 N Street, N.W.  
Washington, D.C. 20036

James R. Forcier  
Attorney for Airtouch Communications, Inc.  
One California St., 9th Floor  
San Francisco, CA 94111

Catherine R. Sloan  
Richard L. Fruchterman  
Richard S. Whitt  
Attorneys for WorldComm, Inc.  
1120 Connecticut Ave., N.W., Suite 400  
Washington, D.C. 20036

Randolph J. May  
Timothy J. Cooney  
Sutherland Asbill & Brennan  
Attorneys for Compuserve, Inc.  
1275 Pennsylvania Ave., N.W.  
Washington, D.C. 20004-2404

Genevieve Morelli  
VP and General Counsel  
The Competitive Telecommunications Assoc.  
1140 Connecticut Ave., N.W., Suite 220  
Washington, D.C. 20036

Brad E. Mutschelknaus  
Steven A. Augustino  
Kelley Drye & Warren  
1200 19th Street, N.W., Suite 500  
Washington, D.C. 20036

Phillip L. Verveer  
Jennifer A. Donaldson  
Jennifer L. Desmond  
1155 21st Street, N.W., Suite 600  
Three Lafayette Centre  
Washington, D.C. 20036-3384

Michael F. Altschul  
Randall S. Coleman  
Cellular Telecommunications Industry  
1250 Connecticut Ave., N.W. Suite 200  
Washington, D.C. 20036

Fiona Branton  
Director, Gov. Relations and Regulatory Counsel  
Information Technology Industry Council  
1250 I Street, N.W.  
Washington, D.C. 20005

Margot Smiley Humphrey  
Attorney for Century Telephone Enterprises  
Koteen & Naftalin  
1150 Connecticut Ave., N.W.  
Suite 1000  
Washington, D.C. 20036

The Bell Atlantic Telephone Companies  
Lawrence W. Katz  
1320 North Court House Road  
Eighth Floor  
Arlington, VA 22201

Jay C. Keithley  
Leon M. Kestenbaum  
H. Richard Juhnke  
Attorneys for Sprint Corporation  
1850 M Street, N.W., Suite 1100  
Washington, D.C. 20036

Craig T. Smith  
Attorney for Sprint Corp  
P.O. Box 11315  
Kansas City, MO 64112

J. Manning Lee  
Teleport Communications Group, Inc.  
Two Teleport Drive, Suite 300  
Staten Island, NY 10311

Robert J. Sachs  
Howard B. Homonoff  
Continental Cablevision, Inc.  
Lewis Wharf Pilot House  
Boston, MA 02110



Brenda L. Fox  
Continental Cablevision, Inc.  
1320 19th Street, N.W., Suite 201  
Washington, D.C. 20036

Howard J. Symons  
Jeniffer A. Purvis  
Mintz Levin Cohn Ferris Glovsky & Popeo  
701 Pennsylvania Ave., N.W., Suite 900  
Washington, D.C. 20004

Ronald Plessner  
James Halpert  
Mark O'Connor  
Piper & Martbury, LLP  
1200 19th Street, N.W., 7th Floor  
Washington, D.C. 200036

Michael J. Shortley III  
Attorney for Frontier Corporation  
180 South Clinton Ave.  
Rochester, N.Y. 14646

Emily Williams  
Assoc. For Local Telecommunications Services  
1200 19th Street, N.W.  
Washington, D.C. 20036

Alison M. Hughes, MPA  
University of Arizona  
Health Sciences Center  
2501 East Elm St.  
Tucson, AZ 85716

Bruce D. Jacobs  
Jason S. Roberts  
Attorneys for Wavephore, Inc.  
Fisher Wayland Cooper Leader & Zaragoza, LLP  
2001 Pennsylvania Ave., N.W., Suite 400  
Washington, D.C. 20006

Brian R. Moir  
Moir & Hardman  
Attorney for Intl. Comm. Assoc.  
2000 L Street, N.W., Suite 512  
Washington, D.C. 20036-4907

Martin Avery  
Executive Dir. Navajo Nation  
Washington Office  
1101 17th Street, N.W. Suite 250  
Washington, D.C. 20036

Mary Dent  
Goldberg Godles Wiener & Wright  
Attorney for Apple Computer, Inc.  
1229 19th Street, N.W.  
Washington, D.C. 20036

Richard Civile  
Center for Civic Networking, Inc.  
P.O. Box 53152  
Washington, D.C. 20008

Timothy R. Graham  
Robert M. Berger  
Joseph M Sandri, Jr.  
Attorneys for Winstar Communications, Inc.  
1146 19th Street, N.W.  
Washington, D.C. 20036

James Rowe  
Alaska Telephone Company  
4341 B Street, Suite 304  
Anchorage, AK 99503

Gary M. Epstein  
Teresa D. Baer  
Michel S. Wroblewski  
1001 Pennsylvania Ave., N.W., Suite 1300  
Washington, D.C. 20004